From: prvs=5033d7c031=tporter@wm.com on behalf of Porter, Timothy [tporter@WM.COM]
Sent: Monday, February 21, 2011 4:07 PM
To: Keith, Glenn (DEP)
Subject: Wheelabrator Comments to Draft Massachusett Regional Haze State Implementation Plan

Dear Mr. Keith,

Please find below our comments to the draft MA Regional Haze State Implementation Plan. As you will note our comments focus on the source specific BART determinations for the Wheelabrator Saugus Municipal Waste Combustor (MWC) facility.

1) General: EPA's provisions in the Regional Haze rule were designed specifically to reduce visibility impairing emissions from major stationary sources that, because of their age (built prior to 1977) were exempted from the New Source Performance Standards (NSPS). The Wheelabrator Saugus MWC facility is considered a BART eligible major stationary source only since it was built in 1975-not because it lacks extensive air pollution controls. The facility already has substantial air pollution controls that go well beyond any BART requirement including spray dryer absorbers (SDAs) or dry scrubbers, large reverse air fabric filters, activated carbon injection systems and Selective Non-Catalytic Reduction (SNCR) NOx controls. The SDA and fabric filters were installed in 1991 while carbon injection and SNCR were installed in 1999. The existing air pollution controls meet the Maximum Achievable Control Technology (MACT) requirements under Sections 129/111d of the 1990 CAA amendments. It has always been our contention that the extensive air pollution controls at the Wheelabrator Saugus facility already meet or exceed BART requirements and consequently source specific BART analysis could have stipulated to this fact. Stipulating that all existing controls are BART could be justified since total visibility impacts for SO2, NOx and PM10 were only 0.232 and 0.179 ddv (depending on modeling platform, NWS and MM5) well below EPA's threshold guidance of 0.5 ddv for determining whether a source contributes to visibility impairment. We point out that Wheelabrator Saugus is treated under BART in the same manner as the EGUs and other fossil fuel fired units built prior to 1977 that did not have the extensive air pollution controls since 1991 like Saugus Further no consideration is given to the fact that Saugus installed SDAs and fabric filters well before they were required by MACT and well before the final Regional Haze BART regulations were adopted by EPA in 1999.

2) SO2 BART Analysis: For SO2 emissions visibility modeling results under both modeling platforms indicated visibility impacts for SO2 emissions were de minimis (0.1 ddv) thus there is no need to conduct any further BART analysis for SO2 emissions. Subsequently, It should be stated that "further SO2 controls are not warranted because visibility impacts are already de minimis (0.1 ddv) not on the basis of "the additional costs to install supplementary controls' which implies additional controls were even contemplated. For comparative purposes it should be noted the current Saugus SO2 limit of 29 ppm 7% O2 is equivalent to 0.069 lbs/MMBtu which is less than 1/2 the presumptive coal fired EGU SO2 BART limit of 0.15 lbs/MMBtu and almost 1/5 the oil fired EGU SO2 BART limit of 0.33 lbs/MMBtu. It seems that Saugus is being held to a much higher BART standard even when significant SO2 reductions have been achieved since 1991. There should be some consideration of this here.

3) PM BART Analysis. For PM emissions it only has to be stated that visibility modeling results under both modeling platforms indicated there were no visibility impacts (0 ddv) from facility PM emissions and thus no requirement to conduct a BART analysis. Since there is no visibility impact from emissions at current limit of 27 mg/dscm there is no need to state that future MACT PM limit of 25 mg/dscm represents BART-BART is not required. Therefore there is no need to even mention any consideration of additional costs for supplemental PM controls since supplemental controls should not even have been considered.

4) NOx BART Analysis: As reasoned above we still believe that the current NOx limit of 205 ppm 7% O2 should represent BART for the facility for two reasons: 1) current visibility impacts from the facility are well below EPA's visibility threshold guidance of 0.5 ddv for whether a source contributes to visibility impairment and 2) current SNCR NOx controls represent MACT. While the optimization test indicated 185 ppm limit could be achievable it was a short term test and may not necessarily represent long term continuous operation under all conditions. The long term uncertainty of complying with the proposed limit is further complicated as MassDEPs' source reduction and recycling initiatives could impact MSW content. If the 185 ppm limit must be retained as BART, we urge MassDEP to consider a longer averaging time such as a 30 day rolling average or a facility average limit of 185 ppm. This would result in same level of annual NOx emission reductions but allow for some short term variability and reduce uncertainty of continuously achieving a proposed limit based on a short term optimization test. Finally, MassDEP references the forthcoming presumptive RACT limits for MWCs. DEP should be aware that Saugus' facility low profile boiler design physically limits SNCR system optimization flexibility with respect to reagent distribution and residence time in furnace at optimum temperature without excess ammonia slip. Subsequently the prospects of a lower limit is very unlikely. The difference in MWC combustor design on NOx emissions control was recognized by EPA in development of the MACT emissions limits for NOx. (See Table 2 in 40 CFR 60 subpart Cb Emission Guidelines).

We trust the above comments, help MassDEP in finalizing the Regional Haze State Implementation Plan. If you have any comments or need any additional information, please let me know.

Regards,

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From: Keith, Glenn (DEP) [mailto:Glenn.Keith@state.ma.us]
Sent: Tuesday, January 11, 2011 3:10 PM
Subject: Draft Massachusett Regional Haze State Implementation Plan

FYI – MassDEP has published its Draft Regional Haze SIP, including how MassDEP proposes to address Best Available Retrofit Technology (BART). Your email was on our BART contact list so I wanted to make sure you received this notice. If you have any questions or need additional information my contact information is below.

To: MassDEP Air Regulations Email List

Name of Plan: Draft Massachusetts Regional Haze State Implementation Plan

Brief Explanation and Rationale for Proposed Plan: Under Section 169A of the federal Clean Air Act, the U.S. Environmental Protection Agency (EPA) requires each state to submit a regional haze state implementation plan (SIP) that describes state goals and measures for improving visibility conditions in certain national parks and wilderness areas, and includes a determination of Best Available Retrofit Technology (BART) for certain air pollution sources. The state must first submit the draft SIP to Federal Land Managers (FLMs) and EPA for comments (a step Massachusetts has completed); then solicit comments from the general public (which MassDEP will be doing through February 21, 2011, with hearings scheduled for February 10 in Springfield and February 11 in Boston); before submitting a final document to EPA for approval.

Web Link to View Draft Plan: http://www.mass.gov/dep/air/priorities/sip.htm#haze

Public Hearing Information: For public hearing information, please see http://www.mass.gov/dep/public/hearings/hazesip.htm

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